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Fred Merrick and Lora Cody	
9 UNITED STATES DISTRICT COURT	
DISTRICT	OF NEVADA
KEYHERRA GREEN ,	Case No. 2:20-cv-00769-GMN-DJA
Plaintiff,	
vs.	STIPULATION, REQUEST AND ORDER
LAS VEGAS METROPOLITAN POLICE	EXTENDING TIME TO ANSWER OR OTHERWISE RESPOND TO
DEPARTMENT; FRED MERRICK; LORA	PLAINTIFF'S COMPLAINT
CODY; and DOES 1-10, inclusive,	(First Request)
Defendants.	(======================================
7 Defendants, Las Vegas Metropolitan Police Department, Fred Merrick and Lora Cody	
8 ("LVMPD Defendants"), by and through their counsel, Kaempfer Crowell, and Plaintiff,	
9 Keyherra Green ("Plaintiff"), by and through her counsel, Peter Goldstein, hereby respectfully	
0 submit this Stipulation, Request and Order Extending Time to Answer or Otherwise Respond to	
Plaintiff's Complaint (the "Stipulation"). This Stipulation is made in accordance with LR 6-1,	
2 LR 6-2, and LR II 7-1 of the Local Rules of this Court. This is the first request for an extension	
	Nevada Bar No. 5781 RYAN W. DANIELS Nevada Bar No. 13094 KAEMPFER CROWELL 1980 Festival Plaza Drive, Suite 650 Las Vegas, Nevada 89135 Telephone: (702) 792-7000 Fax: (702) 796-7181 landerson@kcnvlaw.com rdaniels@kcnvlaw.com Attorneys for Defendant Las Vegas Metropolitan Police Department, Fred Merrick and Lora Cody UNITED STATES DISTRICT KEYHERRA GREEN, Plaintiff, vs. LAS VEGAS METROPOLITAN POLICE DEPARTMENT; FRED MERRICK; LORA CODY; and DOES 1-10, inclusive, Defendants. Defendants, Las Vegas Metropolitan P ("LVMPD Defendants"), by and through the Keyherra Green ("Plaintiff"), by and through the Submit this Stipulation, Request and Order External Stipulation Request and Order External Stipulation, Request and Order External Stipulation (This

of time to file an answer or otherwise respond to Plaintiff's Complaint.

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instant extension is requested as LVMPD Defendants' Counsel requires additional time to 1 prepare a responsive pleading to the Plaintiff's Complaint. 2 Upon agreement by and between all the parties hereto as set forth herein, the undersigned 3 respectfully requests this Court grant an extension of time, up to and including June 2, 2020, for 4 LVMPD Defendants to file an answer or otherwise respond to Plaintiff's Complaint. 5 entering into this Stipulation, none of the parties waive any rights they have under statute, law or 6 rule with respect to Plaintiff's Complaint. 7 DATED this 26th day of May, 2020. 8 KAEMPFER CROWELL PETER GOLDSTEIN LAW CORP 9 10 11 By: /s/ Lyssa S. Anderson By: /s/ Peter Goldstein 12 LYSSA S. ANDERSON Peter Goldstein Nevada Bar No. 5781 Nevada Bar No. 6992 13 RYAN W. DANIELS 10161 Park Run Dr., Ste. 150 Nevada Bar No. 13094 Las Vegas, NV 89145 14 1980 Festival Plaza Drive Suite 650 And -Las Vegas, Nevada 89135 15 Attorneys for Defendant MALCOM P. LAVERGNE & Las Vegas Metropolitan Police 16 **ASSOCIATES** Department, Fred Merrick; and Malcom P. LaVergne Lora Cody 17 Nevada Bar No. 10121 400 S. Fourth St. 18 Las Vegas, NV 89101 Attorneys for Plaintiff 19 20 **ORDER** 21 IT IS SO ORDERED. 22 23 UNITED STATES MAGISTRATE JUDGE 24 May 28, 2020 Dated:

KAEMPFER CROWELL 1980 Festival Plaza Drive Suite 650 Las Vegas, Nevada 89135

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